

Case Name: YSN Imports Inc. et al v. Oberlander et al Case Number: 20-CV-5981 (DG) (TAM)

CASE MANAGEMENT WORKSHEET

Preparation for Initial Conference

Rule 26(f) conference held?	Date: 10/12/21		
Deadline for Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:	10/19/21		
Procedures discussed for producing Electronically Stored Information (ESI)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A
Confidentiality Order to be submitted for Court approval?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A
Anticipated number of depositions:	Plaintiff(s): 5 Defendant(s): 5		
First requests for production of documents and for interrogatories due by:	10/26/21		

Proposed Deadlines for Pre-Settlement Discovery (Phase I)

Agreed upon completion date for Phase I Discovery: (Reciprocal agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)	12/20/21
Date for initial settlement conference: (Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability.)	Early January 2022. Defendant Oberlander gave birth this week, and the presumptive schedule needs to be discussed given that event.

Proposed Deadlines for Discovery and Motion Practice (Phase II)

Motion to join new parties or amend the pleadings: (Presumptively 15 days post initial settlement conference)	Late January 2022
All fact discovery completed by: (Presumptively 3.5 months post first requests for documents/interrogatories)	2/28/22
Joint status report certifying close of fact discovery:	3/7/22
Anticipated number of expert reports:	Plaintiff(s): 2 Defendant(s): 2

Exchange of expert reports completed by: (Presumptively 30 days after fact discovery)	3/31/22	
COMPLETION OF ALL DISCOVERY BY: (Presumptively 9 months after Initial Conference)	5/31/22	
Final date to take first step in dispositive motion practice: (Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery.)	6/30/22	
Do the parties wish to be referred to EDNY's mediation program pursuant to Local Rule 83.8?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Do the parties consent to trial before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)? (The fillable consent form may be found at https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge . Consenting does not affect a party's right to a jury trial.)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

SO ORDERED:

TARYN A. MERKL
United States Magistrate Judge

DATE